



United States Government

Department of Energy

memorandum

Carlsbad Field Office
Carlsbad, New Mexico 88221

DATE: August 9, 2004

REPLY TO
ATTN OF: CBFO:QA:MN:GS:04-1696:UFC 2300.00

SUBJECT: Issuance of Revised Corrective Action Report 04-033, Revision 1

TO: Brian Edgerton, DOE-ID

The Carlsbad Field Office (CBFO) is issuing a revised Corrective Action Report (CAR), 04-033 (Revision 1) to replace the previously issued CAR 04-033. As a result of extensive document reviews and interviews with staff from the Advanced Mixed Waste Treatment Project (AMWTP), and the former INEEL 3,100 m³ Project, CBFO has determined that Block 8 "Requirement that was violated" and Block 9 "Condition Adverse to Quality" required revision. Information made available to CBFO after issuance of CAR 04-033 allowed CBFO to fully evaluate the impact of the conditions adverse to quality.

Revision 1 lists the requirement that was not met; that is, that the AMWTP shipped containers to the Waste Isolation Pilot Plant prior to obtaining approval from CBFO contrary to the provision stated in the March 9, 2004 memorandum from R. Paul Detwiler, DOE-CBFO Acting Manager, to Elizabeth Sellers, DOE-ID Manager, granting authority to AMWTP for characterization and certification of contact-handled homogeneous solid waste.

Please note that this CAR is still classified as an accelerated CAR and must be closed by the Required Corrective Action Completion Date listed in Block 14. Associated with this CAR, CBFO has imposed a work suspension. The scope of the work suspension is as follows:

- Shipments of waste streams BNINW216 and BNINW218 to the waste isolation pilot plant are suspended until further notice.
- Entry of data into the WIPP Waste Information System (WWIS) from the first lots from these waste streams shall not occur until items one and seven listed in Block #10 of CAR 04-033, Revision 1 have been completed and objective evidence of completion has been provided and approved by CBFO. Entry for all other data from these waste streams into the WWIS shall be suspended until further notice.

Please revise your proposed corrective actions to the CAR and the schedule for completion using the attached CAR continuation sheets. Forward this response to Mr. Martin Navarrete prior to the revised due date identified in CAR Block 14.



Brian Edgerton

August 9, 2004

If you have any questions or comments, please contact me at (505) 234- 7357 or Martin Navarrete at (505) 234-7483.


Kerry W. Watson, Director
Office of Characterization and Transportation

Attachments

cc: w/attachments
K. Watson, CBFO *ED
A. Holland, CBFO *ED
R. Knerr, CBFO *ED
M. Navarrete, CBFO *ED
A. Dobson, BNFL *ED
E. Schweinsberg, BNFL *ED
J. Wells, DOE-ID *ED
E. Dumas, BNFL *ED
M. Eagle, EPA *ED
E. Feltcorn, EPA *ED
R. Joglekar, EPA *ED
S. Zappe, NMED *ED
S. Holmes, NMED *ED
D. Winter, DNFSB *ED
J. May, CTAC *ED
WIPP Operating Record, MS 486-06
CBFO Record File
CBFO M&RC

CORRECTIVE ACTION REPORT

1. CAR No.: 04-033, Rev. 1	2. Activity Report No.: NA	3. Page <u>1</u> of <u>2</u>
4. Controlling Document: CBFO:NTP:KWW:VW:04-1061		5. CBFO Assessment Team Leader: N/A
6. Responsible Organization: : Advanced Mixed Waste Treatment Project (AMWTP)		7. CAQ Was Discussed With: <div style="display: flex; justify-content: space-between; margin-top: 5px;"> <div>E. Schweinsberg (BNFL)</div> <div>A. Holland (CBFO)</div> </div> <div style="display: flex; justify-content: space-between; margin-top: 5px;"> <div>E. Dumas (BNFL)</div> <div>J. Wells (DOE-ID)</div> </div> <div style="display: flex; justify-content: space-between; margin-top: 5px;"> <div>D. Swale (BNFL)</div> <div>R. Knerr (CBFO)</div> </div>
8. Requirement that was violated: See Continuation Sheet		
9. Condition Adverse to Quality: See Continuation Sheet		
10. Suggested Actions (Optional): See Continuation Sheet		
11a. Significant CAQ <u>(Yes)</u> or No): 11b. Work Suspension Recommended <u>(Yes)</u> or No): 11c. RCRA-Related <u>(Yes)</u> or No): 11d. Accelerated Corrective Action Required <u>(Yes)</u> or No):		
12. Types of Actions: Remedial: <u>X</u> Investigative: <u>X</u> Root Cause: <u>X</u> Actions to Preclude Recurrence: <u>X</u>		
13. CAR Initiator: <u>Kerry Watson/ Amy Vahan</u> Date: <u>8/9/04</u>		
14. Response Due Date: <u>8/13/04</u> Corrective Action Plan Required: <u>(YES)</u> NO Required Corrective Action Completion Date: <u>8/13/04</u>		
15. a. Concurrence: <u>Kerry Watson/ Amy Vahan</u> <u>8/9/04</u> b. <u>Kerry Watson/ Amy Vahan</u> <u>8/9/04</u> Assessment Team Leader Date Responsible Assistant Manager Date c. <u>Ava Holland/ Amy Vahan</u> <u>8/9/04</u> Quality Assurance Manager Date		
16. Corrective Actions Proposed by the Responsible Organization: Use CAR Continuation Sheet		
17. Acceptance of Proposed Corrective Actions: _____ Assessment Team Leader Date		
18. Verification of Corrective Action Completion: (Use CAR Continuation Sheet)		
19a. Verified By: _____ Name Date		
19b. Trend Cause Code: _____		
20. Closure: _____ Quality Assurance Manager Date		

CBFO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.: 04-033, Rev. 1

2. Activity No.: N/A

3. Page 2 of 2

Block #8

NMED Approval of the Advanced Mixed Waste Treatment Project Final Audit Report, Audit A-03-05 (December 23, 2003) (Excerpt)

However, this approval is limited to only those waste containers remaining from the first lot of the original 3100 m³ sampling "pool" described in the December 12, 2003 Response to Observer Inquiry letter and documented in Waste Stream Profile Number INW216.001, pending further discussions regarding preliminary sampling between the Permittees and NMED.

Based on this stipulation, CBFO issued CBFO Certification Letter CBFO:NTP:KWW:VW:04-1061, Dated March 9, 2004, which states in part:

Based on the results of Audit A-03-05, the CBFO is granting authority for characterization, certification and transportation of homogeneous solids waste (S3000). For the first and second stage sludge TRU waste stream, this authority is limited as follows:

- 1. Preliminary solids sampling and analysis data collected by INEEL during the 3100 m³ project may be used for containers identified to be within lot one*
- 2. Solids sampling and analysis must be conducted to confirm acceptable knowledge for subsequent lots.*
- 3. Prior approval must be obtained from CBFO if AMWTP wishes to apply preliminary solids sampling and analysis data to later lots.*

CBFO approval for lots subject to limitation 3 listed above is contingent upon successful discussion between CBFO and the New Mexico Environment Department as specified in their limited approval letter dated December 23, 2003.

Use of preliminary solids sampling and analysis data for characterization of additional waste streams must be evaluated and approved by CBFO on a case-by-case basis.

Block #9

AMWTP incorrectly identified containers as part of the BNINW216 lot 1 population that should have been excluded.

AMWTP failed to recognize that some containers from the remaining BNINW218 waste population were excluded from the INEEL 3,100 m³ Project population of randomly sorted containers.

Scope of the Work Suspension.

CBFO has suspended further shipments of waste streams BNINW216 and BNINW218 until further notice. AMWTP shall also cease entry of data into WWIS for these waste streams until further notice.

Block #10

AMWTP should, at a minimum, perform the following:

1. Locate and place into configuration control the list of 6,751 drums originally part of the INEEL 3,100 m³ Project for First/Second Stage Sludge (INW216) and the list of 6,083 drums originally part of the INEEL 3,100 m³ Project for Building 374 Sludges (INW218). A copy of this list must be provided to the CBFO.
2. Provide documented evidence to the CBFO of the traceability of these lists to the original sampling populations and efforts.
3. Physically or administratively segregate the actual BNINW216 and BNINW218 containers that were not available for sampling from the remaining containers within those waste streams.
4. Determine if this condition adverse to quality applies to any other waste streams or waste stream lots.
5. Determine the impact of this condition adverse to quality on waste containers that have been shipped to WIPP.
6. Provide objective evidence that the samples for the waste streams or waste stream lots were selected randomly based on information obtained during investigation of this condition adverse to quality.
7. Implement an effective formal system of controls to ensure that drums only from approved lots can be made available for shipment.